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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JENNIFER L. KASILAG, LOUIS MELLINGER,
JUDITH M. MENENDEZ, JACQUELINE M.
ROBINSON, and LINDA A. RUSSELL, *et al.*,
Plaintiffs,

vs.

HARTFORD INVESTMENT FINANCIAL
SERVICES, LLC,

Defendant.

Civil Action No. 11-cv-1083 (RMB)(KMW)

and

Civil Action No. 14-cv-1611 (RMB)(KMW)

JENNIFER L. KASILAG, LOUIS MELLINGER,
JUDITH M. MENENDEZ, JACQUELINE M.
ROBINSON, LINDA A. RUSSELL, DENNIS
RUSSELL, AND DARIN DUDEK, ON BEHALF OF
AND FOR THE BENEFIT OF THE HARTFORD
HEALTHCARE FUND, THE HARTFORD
CONSERVATIVE ALLOCATION FUND, THE
HARTFORD GROWTH OPPORTUNITIES FUND,
THE HARTFORD INFLATION PLUS FUND, THE
HARTFORD BALANCED FUND, THE
HARTFORD CAPITAL APPRECIATION FUND,
THE HARTFORD FLOATING RATE FUND, AND
THE HARTFORD SMALL COMPANY FUND
Plaintiffs,

vs.

HARTFORD FUNDS MANAGEMENT
COMPANY, LLC,

Defendant.

**JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
DEADLINES FOR SUMMARY
JUDGMENT OPPOSITION AND REPLY**

Defendants Hartford Investment Financial Services, LLC and Hartford Funds Management Company, LLC , and Plaintiffs Jennifer L. Kasilag, Louis Mellinger, Judith M. Menendez, Jacqueline M. Robinson, Linda A. Russell, Dennis Russell, and Darin Dudek (“Plaintiffs”), (together the “Parties”), through their undersigned counsel, hereby respectfully submit this Stipulation and [Proposed] Order Extending Deadlines for Summary Judgment Opposition and Reply (the “Stipulation”).

WHEREAS, on June 5, 2015, Plaintiffs filed a Motion for Partial Summary Judgment and Defendants filed a Motion for Summary Judgment (together, the “Summary Judgment Motions”);

WHEREAS, the Parties are preparing their respective responses in opposition to the Summary Judgment Motions and related Rule 56.1 statements;

WHEREAS, the Parties are currently scheduled to submit their respective responses in opposition to the Summary Judgment Motions on July 8, 2015, and their respective reply briefs on July 22, 2015;

WHEREAS, the Parties are simultaneously conducting expert discovery, which includes the depositions of eight expert witnesses, four on behalf of Defendants and four on behalf of Plaintiffs;

WHEREAS, expert discovery is scheduled to conclude July 3, 2015;

WHEREAS, seven of the expert witness depositions have occurred or will occur before July 3, 2015;

WHEREAS, due to scheduling conflicts, the parties are unable to conduct the deposition of Plaintiffs’ expert Kent Barrett before July 3, 2015;

WHEREAS, the parties may incorporate testimony from Mr. Barrett's deposition into their respective responses in opposition to the Motions;

WHEREAS, counsel for both Parties also represent the respective parties in another pending Section 36(b) action, before the Honorable Judge Sheridan in the District of New Jersey, captioned *Sivolella v. AXA Equitable Life Insurance Company*, No. 11-04194 (PGS-DEA) (D.N.J.) ("*Sivolella v. AXA*"), and *Sanford v. AXA Equitable Funds Management Group, LLC*, No. 13-00312 (PGS-DEA) (D.N.J.) ("*Sanford v. AXA*");

WHEREAS, counsel for both Parties are preparing for oral argument on their summary judgment motions in *Sivolella v. AXA* and *Sanford v. AXA*, scheduled for August 5, 2015;

WHEREAS, the Parties agree, subject to the approval of the Court, that the deposition of Mr. Barrett will occur on July 15, 2015;

WHEREAS, the Parties agree, subject to the approval of the Court, that given the above identified scheduling considerations, the deadline for filing their respective responses in opposition to the Summary Judgment Motions shall be extended from July 8, 2015 to July 22, 2015; and

WHEREAS, the Parties further agree, subject to the approval of the Court, that the deadline for filing reply briefs relating to the Summary Judgment Motions shall be correspondingly extended from July 22, 2015 to August 21, 2015;

NOW, THEREFORE, the Parties hereby STIPULATE AND AGREE, by and through their undersigned counsel and subject to the Court's approval, as follows:

1. The deposition of Plaintiffs' expert Kent Barrett may take place on July 15, 2015.
2. The Parties shall serve their respective responses in opposition to the Summary Judgment Motions no later than July 22, 2015.

3. The Parties shall serve their reply briefs relating to their respective Summary Judgment Motions no later than August 21, 2015.

Dated: June 18, 2015

By: /s/ Robert L. Lakind
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Respectfully submitted,

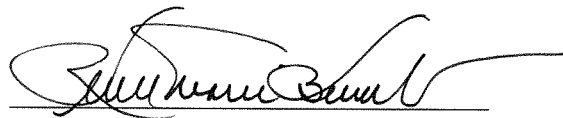
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LLC*

SO ORDERED.

June 23rd, 2015



Hon. Renee Marie Bumb, U.S.D.J.
District of New Jersey